

**BARCLAY DAMON** <sup>LLP</sup>

**Anthony J. Piazza**  
*Partner*

March 10, 2023

**VIA CM/ECF**

Hon. Cheryl L. Pollak  
U.S. Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: 9277QB LLC v. Everest National Insurance Company**  
Civil No.: 1:22-cv-06494  
Our Matter No.: 3201009

Dear Judge Pollak:

On behalf of Defendant Everest National Insurance Company (“Defendant”), we write to provide the Court with a status, as directed during the parties’ most-recent January 10, 2023 conference.

Please be advised that we have made progress in our coverage assessment, which has involved reviewing the four Everest insurance policies under which Plaintiff alleges entitlement to additional insured coverage, along with various coverage issues that have arisen with respect to each of those policies.

As an update, we most recently were able to determine that Impark QB LLC, the lessee of the subject 92-77 Queens Boulevard premises (“the subject premises”), is in fact a subsidiary of Everest’s named insured on these policies, REEF Global, Inc. (“REEF”), for purposes of assessing coverage.

That said, an outstanding and key coverage question involves determining whether the subject premises is scheduled, as required, on the policies alleged, and whether other policy terms may impact the coverage analysis. This involves, in part, locating and assessing a Premises Schedule that is maintained separately from the alleged policies themselves, within various REEF-related documents only accessible to Everest’s Underwriting Department.

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As such, Defendant respectfully requests an additional two weeks, until Friday, March 24, 2023, to provide the Court with its coverage position. Please be advised that Defendant has obtained Plaintiff's counsel's consent to this requested two-week extension of time.

We appreciate Your Honor's consideration of this request. Please contact the undersigned, should any additional information be required in furtherance of this request or with respect to the above correspondence.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'AJPiazza', is written over the typed name.

Anthony J. Piazza

cc: John N. Cuomo, Esq. (via CM/ECF)